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11 *Attorneys for defendants*
12 *Debashis Bagchi and Jon Bengtson*

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15 **IN THE UNITED STATES DISTRICT COURT**
16
17 **FOR THE DISTRICT OF NEVADA**

18 * * * * *

19 **Jaime Martorell, an individual**

20 **CASE NO.: 3:19-cv-00523-MMD-CLB**

21 **Plaintiff,**

22 **vs.**

23 **Stipulation to Amend the Deadline for**
24 **Expert Witness Disclosure**

25 **Debashis Bagchi, an individual and Jon**
26 **Bengtson, an individual,**

27 *(Third Request)*

28 **Defendants.**

Defendants, Debashis Bagchi and Jon Bengtson, by and through their counsel, Pete Cladianos III, Esq., and Charles R. Zeh, Esq., The Law Offices of Charles R. Zeh, Esq., and the plaintiff, Jaime Martorell, by and through his counsel, Anthony Hall, Esq., and Jeremy Clarke, Esq., Simons Hall Johnston PC, do hereby stipulate and agree to amend the Stipulated Discovery Plan and Scheduling Order dated October 28, 2019, to extend the deadlines for the disclosure of expert witnesses and the disclosure of rebuttal expert witnesses. The reasons for this request are twofold. First, the previously stipulated discovery date was a Saturday which made timely disclosure difficult. Second, the restrictions placed upon the economy in general and travel, in particular, amid the COVID-19 pandemic have made it difficult for the expert witnesses to complete their reports. The parties agree that these factors create good cause for requesting this extension within 21 days before the deadline.

1 In order to resolve the scheduling concerns, the parties agree to extend the deadline for the initial
2 disclosure of expert witnesses and the disclosure of rebuttal experts, as set forth below:

3 1. The disclosure of expert witnesses shall be completed on or before June 26, 2020.
4 This is more than 30 days prior to the discovery cut-off date.

5 2. The disclosure of rebuttal expert witnesses is anticipated to be completed on or
6 before July 26, 2020. This rebuttal expert disclosure deadline would be 30 days later. However,
7 plaintiff may request and defendants would agree to additional time for a rebuttal disclosure,
8 should it be required.

9 3. All other deadlines set forth in this matter shall remain in effect.
10 This is the third request for an extension of time for discovery in this matter.

11 Dated: June 19, 2020

Dated: June 19, 2020


12 By: /s/ Jeremy Clarke, Esq.
13 Jeremy Clarke, Esq.
14 Nevada State Bar No. 13849
15 Simons Hall Johnston PC
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Reno, NV 89509
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By: /s/ Pete Cladianos III, Esq.
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17 ORDER

18 IT IS SO ORDERED.

19 Dated this 19th day of June, 2020.

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United States Magistrate Judge

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